

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

CITY OF PROVIDENCE, RHODE ISLAND,	:	Civil Action No. 1:14-cv-02811-JMF
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
Plaintiff,		:
vs.		:
BATS GLOBAL MARKETS, INC., et al.,	:	
Defendants.		:
AMERICAN EUROPEAN INSURANCE	:	Civil Action No. 1:14-cv-03133-JMF
COMPANY, Individually and on Behalf of All	:	
Others Similarly Situated,	:	<u>CLASS ACTION</u>
Plaintiff,		:
vs.		:
BATS GLOBAL MARKETS, INC., et al.,	:	
Defendants.		:

[Caption continued on following page.]

THE INSTITUTIONAL INVESTORS' NOTICE OF MOTION AND MOTION FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
SELECTION OF COUNSEL

x

HAREL INSURANCE CO, LTD., Individually : Civil Action No. 1:14-cv-03608-JMF
and on Behalf of All Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
BATS GLOBAL MARKETS, INC., et al., :
Defendants. :
:

JAMES J. FLYNN and DOMINIC A. : Civil Action No. 1:14-cv-04321-UA
MORELLI, Individually and on Behalf of All :
Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
BANK OF AMERICA CORPORATION, et :
al., :
Defendants. :
:

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on July 9, 2014 at 3:30 p.m., or as soon thereafter as the matter may be heard, in the Courtroom of the Honorable Jesse M. Furman, Courtroom 1105 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY, City of Providence, Rhode Island, Plumbers and Pipefitters National Pension Fund, Employees' Retirement System of the Government of the Virgin Islands, State-Boston Retirement System, and Första AP-fonden (collectively, the "Institutional Investors") will, and hereby do, move this Court pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), for an order: (1) consolidating the above-captioned actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing the Institutional Investors as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995; (3) approving the Institutional Investors' selection of Robbins Geller Rudman & Dowd LLP, Motley Rice LLC and Labaton Sucharow LLP as lead counsel for the proposed class; and (4) granting such other and further relief as the Court may deem just and proper.

This Motion is based on this Notice of Motion, the Memorandum of Law in support thereof, the Declaration of Patrick J. Coughlin in support thereof, a proposed order, the pleadings and files herein, and such other written or oral argument as may be presented to the Court.

DATED: June 17, 2014

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s/ Patrick J. Coughlin

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 17, 2014.

s/ Patrick J. Coughlin
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